

Mr. Craig Weitbrecht
Monsanto Global Seed Company
908 N Independence
Windfall, IN 46076

Re: **159-12858-00010**
Second Administrative Amendment to
FESOP 159-11180-00010

Dear Mr. Weitbrecht:

Monsanto Global Seed Company was issued a Federally Enforceable State Operating Permit (FESOP) on January 25, 2000 for operating a corn and soyabean seed plant located at 908 North Independence, Windfall, IN 46076. A letter requesting that the permit be amended reflecting the removal of the corn dryer, identified as 8E, and the corn sheller, identified as 9A, and for the removal of Section C.13 (Emergency Reduction Plan), was received on October 13, 2000. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended.

I. The Sections A.1 and A.2 have been revised as follows:

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary ~~corn~~ and soyabean seed operating plant.

Authorized individual:	Craig Weitbrecht
Source Address:	908 North Independence, Windfall, Indiana 46076
Mailing Address:	908 North Independence, Windfall, Indiana 46076
Phone Number:	765-945-7121
SIC Code:	0723
County Location:	Tipton
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) soyabean receiving pit, identified as 1E, with a maximum receiving capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a cyclone as control, and exhausting to stack 1A.
- (b) Two (2) cleaners, identified as 3E, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a baghouse as control, and exhausting to stack 3A.
- (c) Eight (8) spirals, identified as 4E, with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a baghouse as control, and exhausting to stack 4A.
- (d) Three (3) gravity tables, identified as 5E, 6E and 7E, with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using cyclones as control, and exhausting to stacks 5A, 6A and 7A.
- ~~(e) One (1) corn dryer, identified as 8E, with a maximum drying capacity of sixteen thousand eight hundred (16,800) pounds of corn per hour, and exhausting to stack 8A.~~
- ~~(f) One (1) corn sheller, identified as 9A, with a maximum shelling capacity of forty four thousand and eight hundred (44,800) pounds of corn per hour.~~
- ~~(g)~~**(e)** One (1) baghouse, identified as baghouse 8A, venting otherwise-fugitive emissions from storage bins, scales, conveyors and bag fillers located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.

- II. After reviewing the request for removing Section C.13 by Monsanto Global Seed Company, OAM determined that the PTE for all regulated pollutants are less than 100 tpy. Therefore, Section C.13 has been removed and Section C.14 through C.20 have been renumbered accordingly.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

~~G.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]~~

~~Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):~~

- ~~(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.~~

- ~~(b) These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~within ninety (90) days from the date of issuance of this permit.~~

- ~~_____ The ERP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~
- ~~_____ (c) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.~~
- ~~_____ (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~
- ~~_____ (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~
- ~~_____ (f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3].~~

III. Section D.1 has been revised to reflect the removal of the corn dryer and corn sheller as follows:

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) soyabean receiving pit, identified as 1E, with a maximum receiving capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a cyclone as control, and exhausting to stack 1A.
- (b) Two (2) cleaners, identified as 3E, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a baghouse as control, and exhausting to stack 3A.
- (c) Eight (8) spirals, identified as 4E, with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a baghouse as control, and exhausting to stack 4A.
- (d) Three (3) gravity tables, identified as 5E, 6E and 7E, with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using cyclones as control, and exhausting to stacks 5A, 6A and 7A.
- ~~(e) One (1) corn dryer, identified as 8E, with a maximum drying capacity of sixteen thousand eight hundred (16,800) pounds of corn per hour, and exhausting to stack 8A.~~
- ~~(f) One (1) corn sheller, identified as 9A, with a maximum shelling capacity of forty-four thousand and eight hundred (44,800) pounds of corn per hour.~~

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the cyclones and baghouses shall be in operation at all times the ~~corn~~ or soyabean seed process ~~are~~ **is** in operation, and shall not exceed the allowable particulate matter (PM) emission rate listed for each facility below:

Facility	Stack ID	326 IAC 6-3-2 (Pounds per Hour)
Soyabean Receiving Pit	1A	40.04
Soyabean Cleaners(2)	3A	50.33
Soyabean Spirals(8)	4A	79.52
Gravity Table 1	5A	19.18
Gravity Table 2	6A	19.18
Gravity Table 3	7A	19.18
Soyabean Packaging	No Stack	40.04
Corn Dryer	8A	N/A*
Corn Sheller	No Stack	16.51

* The corn dryer instead has a visible emissions limit in condition D.1.5.

D.1.2 Particulate Matter (PM) [326 IAC 2-2, and 40 CFR 52.21]

Any change or modification which may increase the after control PM emissions to 250 tons per year or more for the entire source must be approved by the Office of Air Management (OAM) before such change may occur.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.5 Visible Emissions Notations(All Facilities except Corn Dryer)

- (a) Daily visible emission notations of the ~~corn~~ and soyabean facilities ~~(except corn dryer)~~ stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

~~D.1.6~~ Visible Emissions Notations(Corn Dryer)

~~That pursuant to 326 IAC 2-8.4(1), the visible emissions shall meet the following:~~

- ~~(a) Visible emissions from the corn dryer shall not exceed an average of ten percent (10%) opacity in twenty four (24) consecutive readings in a six (6) minute period.~~

~~D.1.7~~ D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the soyabean ~~and corn~~ seed process, at least once weekly when the soyabean ~~and corn~~ seed process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, (and local agency when applicable) and shall be calibrated at least once every six (6) months.

~~D.1.8~~ D.1.7 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

~~D.1.9~~ D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

~~D.1.10~~ D.1.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

~~D.1.11~~ D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.5 ~~and D.1.6~~, the Permittee shall maintain records of daily visible emission notations of the ~~corn~~ and soyabean seed stack exhaust.
- (b) To document compliance with Condition ~~D.1.7~~ **D.1.6**, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure
 - (2) Documentation of all response steps implemented, per event
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.

- (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Linda Quigley, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3284 or dial (800) 451-6027, press 0 and ask for 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

Reviewer's Initials

cc: File - Tipton County
U.S. EPA, Region V
Tipton County Health Department
Air Compliance Section Inspector - Ryan Hillman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michelle Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)

**Monsanto Global Seed Company
908 North Independence
Windfall, Indiana 46076**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F159-11180-00010	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: January 25, 2000
First Significant Permit Revision 159-11881-00010	Issuance Date: April 18, 2000
First Administrative Amendment 159-12576-00010	Pages Amended:3-5, 30
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: September 20, 2000
Second Administrative Amendment 159-12858-00010	Pages Amended: 2-4, 19-28
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-8-3(b)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]
- A.4 FESOP Applicability [326 IAC 2-8-2]
- A.5 Prior Permit Conditions

SECTION B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-8-1]
- B.3 Permit Term [326 IAC 2-8-4(2)]
- B.4 Enforceability [326 IAC 2-8-6]
- B.5 Termination of Right to Operate [326 IAC 2-8-9][326 IAC 2-8-3 (h)]
- B.6 Severability [326 IAC 2-8-4(4)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]
- B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]
- B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]
- B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)]
- B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]
- B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)][326 IAC 2-8-5(a)(1)]
- B.14 Emergency Provisions [326 IAC 2-8-12]
- B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.17 Permit Renewal [326 IAC 2-8-3(h)]
- B.18 Permit Amendment or Modification [326 IAC 2-8-10][326 IAC 2-8-11.1]
- B.19 Operational Flexibility [326 IAC 2-8-15]
- B.20 Construction Permit Requirement [326 IAC 2]
- B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)]
- B.22 Transfer of Ownership or Operation [326 IAC 2-8-10]
- B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

SECTION C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- C.1 Overall Source Limit [326 IAC 2-8]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1][IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]
- C.7 Stack Height [326 IAC 1-7]
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-8-4(3)]

- C.9 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

- C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]
- C.11 Monitoring Methods [326 IAC 3]
- C.12 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]

- C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]
- C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4]
- C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

- C.16 Monitoring Data Availability
- C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]
- C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

Stratospheric Ozone Protection

- C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS
Soyabean seed process

SECTION D.2 FACILITY OPERATION CONDITIONS
Aspirator

SECTION D.3 FACILITY OPERATION CONDITIONS
Baghouse 8A

Certification Form

Emergency/Deviation Form

Quarterly Compliance Monitoring Report Form

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary soyabean seed operating plant.

Authorized individual:	Craig Weitbrecht
Source Address:	908 North Independence, Windfall, Indiana 46076
Mailing Address:	908 North Independence, Windfall, Indiana 46076
Phone Number:	765-945-7121
SIC Code:	0723
County Location:	Tipton
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) soyabean receiving pit, identified as 1E, with a maximum receiving capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a cyclone as control, and exhausting to stack 1A.
- (b) Two (2) cleaners, identified as 3E, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a baghouse as control, and exhausting to stack 3A.
- (c) Eight (8) spirals, identified as 4E, with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a baghouse as control, and exhausting to stack 4A.
- (d) Three (3) gravity tables, identified as 5E, 6E and 7E, with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using cyclones as control, and exhausting to stacks 5A, 6A and 7A.
- (e) One (1) baghouse, identified as baghouse 8A, venting otherwise-fugitive emissions from storage bins, scales, conveyors and bag fillers located inside the Packaging Tower and the Conditioning Tower. Exhaust air is returned to the Packaging Tower.

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.11 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.12 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or

- (4) The process has already returned to operating within “normal” parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly report. Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) soyabean receiving pit, identified as 1E, with a maximum receiving capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a cyclone as control, and exhausting to stack 1A.
- (b) Two (2) cleaners, identified as 3E, with a combined maximum cleaning capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a baghouse as control, and exhausting to stack 3A.
- (c) Eight (8) spirals, identified as 4E, with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using a baghouse as control, and exhausting to stack 4A.
- (d) Three (3) gravity tables, identified as 5E, 6E and 7E, with a combined maximum sorting capacity of sixty thousand (60,000) pounds of soyabean seeds per hour, using cyclones as control, and exhausting to stacks 5A, 6A and 7A.

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the cyclones and baghouses shall be in operation at all times the soyabean seed process is in operation, and shall not exceed the allowable particulate matter (PM) emission rate listed for each facility below:

Facility	Stack ID	326 IAC 6-3-2 (Pounds per Hour)
Soyabean Receiving Pit	1A	40.04
Soyabean Cleaners(2)	3A	50.33
Soyabean Spirals(8)	4A	79.52
Gravity Table 1	5A	19.18
Gravity Table 2	6A	19.18
Gravity Table 3	7A	19.18
Soyabean Packaging	No Stack	40.04

D.1.2 Particulate Matter (PM) [326 IAC 2-2, and 40 CFR 52.21]

Any change or modification which may increase the after control PM emissions to 250 tons per year or more for the entire source must be approved by the Office of Air Management (OAM) before such change may occur.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-8-5(a)(1), (4)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.5 Visible Emissions Notations(All Facilities except Corn Dryer)

- (a) Daily visible emission notations of the soyabean facilities stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the soyabean seed process, at least once weekly when the soyabean seed process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, (and local agency when applicable) and shall be calibrated at least once every six (6) months.

D.1.7 Cyclone Inspections

An inspection shall be performed each calender quarter of all cyclones when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.9 Cyclone Failure Detection

In the event that cyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.5, the Permittee shall maintain records of daily visible emission notations of the soyabean seed stack exhaust.
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure
 - (2) Documentation of all response steps implemented, per event
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).

- (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.